



East Coast Shellfish Growers Association
1623 Whitesville Road
Toms River, New Jersey 08755

National Organics Standards Board
c/o Valerie Frances
Room 4008 – South Building
1400 and Independence Avenue, SW
Washington, DC 20230-0001

March 31, 2006

Via email to NOSB.Livestock@usda.gov

Re: Final Report by the Aquaculture Working Group of the NOSB

Dear Ms. Frances,

We have noted with dismay that the Aquaculture Working Group of the National Organics Standards Board (NOSB) has failed in their final report to address molluscan shellfish issues. Our industry would like to have an organic standard with which to work, and in fact we already face international competition from countries where such standards exist that has put our domestic industry at a competitive disadvantage.

A number of us in the shellfish community have been involved with the various NOSB committees and task forces that have attempted to work on this issue. We recognize that the roots of the organic movement are in the terrestrial agriculture realm, but didn't realize how much work we needed to do to educate the organic folks as to our industry operations and our needs. We felt outnumbered in the sessions we attended and wasted considerable time discussing issues, like feeds, that had no relevance to shellfish farming.

In order to develop organic standards that can be applied to shellfish farming we suggest that the NOSB appoint a task force with the specific mission to develop these standards in a timely fashion. If you wish we can help you identify shellfish experts from academia and industry representatives that can be part of this process. We are confident that such a task force can develop standards that will meet the criteria of the National Organics Program, and enable a segment of our domestic shellfish farmers to compete in the growing organics market.

Thanks for your consideration. We look forward to working with you on this critical issue.

Sincerely,

Edwin W. Rhodes
Executive Director
East Coast Shellfish Growers Association